

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GOOGLE, LLC,	:	C.A. No. 21-mc-419-MN
	:	
Petitioner,	:	
	:	
v.	:	
	:	
	:	
TERRIER SSC, LLC	:	
	:	
Respondent.	:	
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GOOGLE, LLC,	:	C.A. No. 21-mc-440-MN
	:	
Petitioner,	:	
	:	
v.	:	
	:	
	:	
BP FUNDING TRUST,	:	
	:	
Respondent.	:	
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**DECLARATION OF MORGAN E. PIETZ IN SUPPORT OF TERRIER
SSC, LLC AND BP FUNDING TRUST’S OMNIBUS
OPPOSITION TO GOOGLE’S MOTIONS TO COMPEL**

I, Morgan E. Pietz, am over the age of 18 and hereby declare based on my own personal knowledge:

1. I am an attorney duly admitted to practice law in the State of California and was approved to appear *pro hac vice* by this Court on or about October 20, 2021. I am counsel of record for Respondents, BP Funding Trust (“BP Funding”) and

Terrier SSC, LLC (“Terrier”) in the above-entitled actions.

2. I make this declaration in support of Terrier and BP Funding’s Omnibus Opposition to Google’s Motions to Compel.

3. Attached as **Exhibit A** is a true and correct copy of Plaintiff’s Motion For Protective Order Requiring Withdrawal of Subpoenas Against Nonparties BP Funding and Terrier SSC, LLC in the matter of *WSOU Investments, LLC d/b/a/ Brazos Licensing and Development v. Google*, currently pending before the United States District Court for the Western District of Texas Waco Division.

4. Attached as **Exhibit B** is a true and correct copy of the Notice of Service of Terrier SSC, LLC and BP Funding Trust’s objections to all four subpoenas to them served on October 19, 2021, along with notice that Terrier and BP Funding would be opposing the Google’s motions and also joining with WSOU in Rule 45(f) motion to transfer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of October, 2021 at Beverly Hills, California.

BY: /s/ Morgan E. Pietz